U.S. Comments on Draft Texts of the Code Section 3.2, Appendix 3.2.1 (Bovine Semen) of the OIE *International Animal Health Code*

(Submitted to OIE on January 7, 2002)

We have reviewed the latest draft of the Code Appendix on Bovine Semen (Appendix 3.2.1) and have the following recommendations:

Note: Any suggested deletions are shown as "~~strike outs~~" and any new suggested wording is indicated in **bold**:

Note: All of our comments pertain to the proposed IBR testing requirement changes.

Article 3.2.1.5 – sections 1d), 2f) and 4f)

Pre-quarantine testing:

1 d) Suggested change: The animals **entering an IBR-IPV free herd** should either:

i) come from an IBR-IPV herd as defined in Article 2.3.5.3; or

ii) be subjected with negative results, to diagnostic tests for IBR/IPV on a blood sample,

Testing in the quarantine station prior to entering the semen collection facility:

2 f) Suggested change: IBR-IPV

The animals **entering and IPR-IPV free herd** should be subjected, with negative results, to a diagnostic test ….

Testing Programme for bovines resident in the semen collection facilities:

4 f) Suggested change: IBR-IPV

i) The animals **residing in an IBR/IPV free herd** should comply with the provisions of in paragraph 2c of Article 2.3.5.3; or

ii) The animals residing in a non-IBR/IPV free herd should comply with the provisions of paragraph 2 or paragraph 3 of Article 2.3.5.7

Rationale for our suggested changes: We **cannot** accept the proposal that all bulls entering any semen collection facility be IBR-seronegative. There is no conclusive scientific evidence to support a health measure that seronegativity is required for bulls to produce semen free of IBR virus. In fact, the current OIE Chapter on IBR, Chapter 2.3.5, and specifically section 2.3.5.7.3, stipulates a condition wherein a virus isolation test of the semen may be conducted. Experience in North America for several decades indicates that IBR-seropositive bulls residing in a semen collection center can be successfully used for artificial insemination and that semen distributed from bulls residing in such a center does not transmit disease. It would both illogical and irresponsible for Article 2.3.5.7 to be ignored in Appendix 3.2.1.

In addition, vaccination for IBR is almost ubiquitous in North America, especially in the beef cattle industry. A requirement that mandates that all bulls entering a collection center be IBR-seronegative unnecessarily disqualifies an entire category of bulls. Furthermore, the management of semen collection facilities as regards IBR ensures that countries who may want semen from sero-negative bulls will get it. In North America, a collection center that wishes to export semen to multiple regions of the world may within its structure have established several distinct herds. Some of these herds do comply with, for example, the European Union protocol for IBR-seronegative status of all bulls entering those particular herds. So it is inappropriate and unacceptable for the OIE to dictate a specific component of a disease control program of one group of countries onto the remainder of the world when there is no compelling evidence that one control program is better than another. We can speak with great confidence that in North America, for at least the past three decades, financial losses within the industry or to its costumers from consequences of infectious bovine diseases has been essentially zero.

Thank you for considering our comments and for the opportunity to review this Chapter.

Alfonso Torres
Deputy Administrator
United States of America